

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Cassandra Quaglia (815) 987-4458

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

DION DIXON

CASE NUMBER: 23 CR 50035

FILED

9/15/2023

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about September 14, 2023, at Rockford, in the Northern District of Illinois, Western Division, the defendant(s) violated:

Code Section

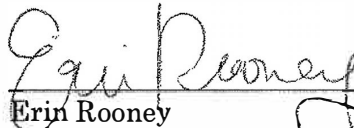
Title 18, United States Code, Section
2113(a)

Offense Description

by force and violence, and by intimidation, attempts to take from the person and presence of another any property and money or any other thing of value belonging to and in the care, custody, control, management, and possession of Rockford Municipal Employees Credit Union, whose deposits were then insured by the National Credit Union Administration Board and Associated Bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



Erin Rooney

Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: September 15, 2023



Judge's signature

City and state: Rockford, Illinois

JEFFREY I. CUMMINGS, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Erin Rooney, having been duly sworn, declare as follows:

1. I am a Special Agent (SA) with the United States Department of Justice, Federal Bureau of Investigation (FBI) currently assigned to Chicago Field Office, Rockford Resident Agency (RRA). I have been employed by the FBI for nine years and have been an FBI Agent for nine months. I have been assigned to the Chicago Field Office, RRA as an FBI Agent since December of 2022. Prior to my assignment to RRA, I was employed as an Investigative Specialist (IS) for the FBI from 2014 to 2018 in Jacksonville, Florida and was a Surveillance Program Specialist (SPS) for the FBI in Manassas, Virginia from 2018 to 2022. During my tenure as an FBI employee, I have participated in numerous investigations covertly collecting human intelligence primarily in support of national security investigations. In joining the FBI as a Special Agent (SA), I initially spent five months at the FBI training academy in Quantico, Virginia, where I received training in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and confirmation of probable cause. My current responsibilities include investigation of violent crimes, including among others, kidnapping, bank robbery, and the apprehension of fugitives.

2. The information and circumstances of the offenses described in this affidavit are based on a combination of personal knowledge of the facts, discussion with other law enforcement officials, other investigative activities conducted, and investigative materials obtained during the investigation.

3. I make this affidavit in support of an application for issuance of a criminal complaint and arrest warrant for Dion Lamar Dixon (Dixon), of 315 S. 5th Street, Rockford, Illinois, for violations of Title 18 U.S. Code § 2113: attempted robbery. This affidavit does not include all facts known to me, but rather contains facts sufficient to establish probable cause. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Dixon committed the offense alleged in the complaint.

STATUTORY BACKGROUND

4. Title 18 U.S.C. Section 2113 (a) provides that, “Whoever, by force and violence, or by intimidation, takes, or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion, any property or money or any other thing of value belonging to, in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association...shall be fined under this title or imprisoned not more than twenty years, or both.” The term “bank” is defined in Title 18 U.S.C Section 2113(f) as “any member bank of the Federal Reserve System...and any institution the deposits of which are insured by the Federal Deposit Insurance Corporation (FDIC). The term “credit union” means any Federal credit union and any State-chartered credit union the accounts of which are insured by the National Credit Union Association Board (NCUA).

STATEMENT OF FACTS

5. On 9/14/2023, at approximately 9:05 am, Dixon entered Rockford Municipal Employees Credit Union, located at 634 N Church Street, Rockford, IL 61103 (hereafter referenced as credit union). The credit union is insured by National Credit Union Administration (NCUA). Dixon played loud music from his cell phone while he was inside the credit union. Dixon went over to

the table where customers fill out bank slips and wrote a note telling the credit union teller to give him ten thousand dollars. Dixon approached the first teller at the window (hereafter referred to as teller one) and slid a piece of paper under the glass. Teller one told Dixon she could not give him ten thousand dollars. Dixon continued to push the demand note under the window and teller one continued to refuse. During interactions with teller one, Dixon appeared on the video surveillance to be bending down at the glass teller window. Teller one asked another teller (hereafter referred to as teller two) to get the supervisor who was in her office in the back of the credit union. Dixon then moved to another teller window and pushed the demand note under the window to the supervisor. The supervisor refused to meet Dixon's demand and Dixon eventually departed the credit union. There were three tellers and a supervisor present during the attempted robbery. The supervisor was observed to be visibly upset by Dixon's actions when interviewed by law enforcement after the event. Dixon was unarmed and did not verbally speak to anyone inside the credit union.

6. After he departed the credit union, Dixon entered Associated Bank, located at 612 N Main Street, Rockford, Illinois 61103 (hereafter referred to as bank). The bank is insured by the Federal Deposit Insurance Corporation (FDIC). At the bank, Dixon wrote another note on a piece of paper asking for ten thousand dollars. As Dixon had done earlier at the credit union, he waited in line with the note to see a teller. At 9:12 am, Dixon's attempt to rob the bank was interrupted when he was arrested by Rockford Police Department. Dixon did not make contact with any of the employees at the bank. Dixon was taken to Rockford Police Department, District 2, located at 1410 Broadway, Rockford, Illinois 61104.

7. Dixon was interviewed at Rockford Police Department District 2 and confirmed he wrote the note and provided it to the teller at the credit union. Dixon advised he wrote the note for

education and as an experiment to see if the credit union would meet his demand. Dixon informed investigating Agents he needed money to feed his family. Dixon did not believe what he did was wrong at the time because he felt as though he was entitled to the money as a “God” or “King”. Dixon believed Jesus would help him. Dixon also confirmed he wrote a similar note at the bank with the same intention he had at the credit union. Dixon was arrested prior to being able to give it to a bank employee. Both demand notes were located on Dixon’s person at time of arrest.

CONCLUSION

Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that Dion Lamar Dixon has committed the offense of attempted bank robbery in violation of Title 18, U.S. Code, Section 2113.

FURTHER AFFIANT SAYETH NOT.



Erin Rooney
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on September 15, 2023.



Honorable JEFFREY I. CUMMINGS
United States Magistrate Judge